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8 Attorneys for Defendant
REGENTS OF THE UNIVERSITY OF CALIFORNIA

10 UNITED STATE DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO

12 KULGINDER SRAN,) Case No. C-15-4471-JST
13 Plaintiff,)
14) **STIPULATION AND [PROPOSED]**
15 vs.) **ORDER CONTINUING EXPERT**
16) **DISCLOSURE AND EXPERT**
17) **DISCOVERY DEADLINES**
18) Complaint Filed: September 30, 2015
19)
REGENTS OF THE UNIVERSITY OF)
CALIFORNIA)
Defendants.)

RECITALS

22 WHEREAS the parties have exchanged written discovery and substantial documents in
23 the case, and otherwise diligently worked together to move the case forward with respect to
24 discovery and the scheduling of depositions;

WHEREAS Plaintiff's deposition (two sessions) was completed on January 10, 2017;

26 WHEREAS the deposition of Dr. Linda Centore is scheduled to take place on February
27 24, 2017;

WHEREAS two other witness depositions are currently pending and in the process of being scheduled;

WHEREAS the parties participated in mediation with Hon. Justice Lambden on November 15, 2016;

WHEREAS the parties are still in communication regarding potential settlement;

WHEREAS the current expert disclosure deadline is March 6, 2017;

WHEREAS the current expert discovery cutoff deadline is April 10, 2017;

WHEREAS the parties are still in the process of conducting additional fact discovery including written discovery, document production and witness depositions;

10 WHEREAS the parties desire to conclude fact discovery before engaging in expert
11 witness discovery;

12 WHEREAS the parties need additional time in order to meaningfully conduct expert
13 witness discovery;

14 WHEREAS the parties are still in the process of engaging in settlement discussions and
15 desire to determine whether informal resolution is possible before expending significant time and
16 expense conducting expert witness discovery;

17 WHEREAS the parties respectfully request that the Court continue the current expert
18 discovery deadlines as outlined by the parties below, or as soon thereafter as the Court is
19 available. Alternatively, the parties request a CMC to further discuss these issues with the Court.

STIPULATION

THEREFORE, IT IS HEREBY STIPULATED THAT the expert disclosure and expert

||||

1 discovery cutoff deadlines are continued as follows:

Event	Current Date	Proposed Date
Expert Disclosure Deadline	March 6, 2017	April 10, 2017
Expert rebuttal	None set.	May 1, 2017
Expert Discovery Cutoff	April 10, 2017	May 15, 2017

7 Dated: February 24, 2017

GORDON & REES
SCULLY MANSUKHANI LLP

9 By: /s/ Jennifer M. Lynch
10 JENNIFER M. LYNCH
11 Attorney for Defendant
12 REGENTS OF THE UNIVERSITY OF
13 CALIFORNIA

14 Dated: February 24, 2017

15 LEIGH LAW GROUP

16 By: /s/ Jay Jambeck
17 Jay Jambeck
18 Attorney for Plaintiff
19 KULGINDER SRAN

~~PROPOSED~~ ORDER

20 According to the parties' stipulation, and good cause appearing, it is hereby ordered that
21 the expert disclosure and expert discovery cutoff deadlines of this matter are hereby continued as
22 follows:

Event	Current Date	Proposed Date
Expert Disclosure Deadline	March 6, 2017	April 10, 2017
Expert rebuttal	None set.	May 1, 2017
Expert Discovery Cutoff	April 10, 2017	May 15, 2017

25 IT IS SO ORDERED.

26
27 Dated: February 28, 2017


28
Hon. Jon S. Tigar